



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029**

January 28, 2008

Mr. David K. Oliveria
BRAC Program Manager
National Naval Medical Center
8901 Wisconsin Avenue
Bethesda, Maryland 20889

Re: National Naval Medical Center, Activities to Implement 2005 Base Realignment and Closure Actions, Construction and Operation of New Facilities for Walter Reed National Military Medical Center, Bethesda, Maryland Draft Environmental Impact Statement (CEQ #20070517)

Dear Mr. Oliveria:

In accordance with the National Environmental Policy Act of 1969 and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement for the National Naval Medical Center in Bethesda, MD. As a result of this review, EPA has assigned this Draft Environmental Impact Statement (DEIS) a rating of EC-2 (Environmental Concerns/Insufficient Information), which indicates that we have environmental concerns regarding the proposal and that there is insufficient information in the document to fully assess the environmental impacts of this project. A copy of EPA's ranking system is enclosed for your information.

EPA understands that Walter Reed Army Medical Center activities will be relocated from Washington, DC to the National Naval Medical Center in Bethesda, MD. The DEIS evaluates the potential environmental effects of construction and operation of new facilities at the National Naval Medical Center (NNMC). In addition to the No Action Alternative, two alternatives are presented. Alternative One (the preferred alternative) would add approximately 1,144,000 square feet (SF) of new building construction, provide approximately 508,000 SF of renovation to existing building space at NNMC, and provide approximately 824,000 SF of new parking facilities.

Under Alternative Two, the same facilities are proposed; some facility sites change and the choice of new construction versus renovation of some facilities differs from Alternative One. Alternative Two would add approximately 1,230,000 SF of new building construction, approximately 423,000 SF of building renovation, and approximately 824,000 SF of new parking facilities. Both alternatives would accommodate approximately 2,500 additional staff and an estimated 1,862 patients and visitors each weekday.



EPA commends the Navy for its concise evaluation; however, clarification is necessary for two areas of concern—wetlands and historic resources.

Wetlands

As noted on page 2-20, “The only structure proposed under Alternatives One and Two in the vicinity of potential wetlands is the Southern Parking facility, which as currently proposed would be at least 75 feet from the stream and would not encroach on either the potential wetland or within the 25-foot buffer afforded to non-tidal wetlands by the State of Maryland.” As the Navy mentions (page 3-11), “Any activity that involves excavating, filling, changing drainage patterns, disturbing the water level or water table, grading and removing vegetation in a non-tidal wetland or within a 25-foot buffer requires a permit.” Even though the South Parking structure is well outside the 25-foot buffer, the wetland areas have not been delineated and no jurisdictional determination has been made. As the Navy is aware, if the wetland is designated as a Special State Concern, the buffer is expanded to 100-feet. If this is the case, environmental impacts can be adverse as there appears to be at least a 75 foot buffer. It is suggested that the Navy delineate wetlands, especially in the South Parking area, to ensure there is no impact to wetlands designed Special State Concern.

Historic Resources

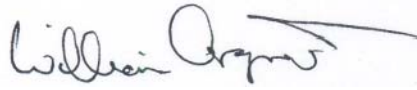
It is stated on page 4-57, “The Navy worked with the staffs of the MD SHPO and NCPC prior to officially submitting a Design Concept for the facilities to the NCPC at its October 4, 2007 meeting. Although the formal Section 106 consultation had not yet been initiated, the informal discussions and revisions that took place prior to its review and favorable comment by NCPC constitute a first step toward resolving issues connected with the impact of these planned facilities on the most sensitive historic properties.”

In addition, it is stated in the DEIS that the Navy intends to pursue a formal Section 106 consultation with the goal of achieving a ratified agreement document to resolve all adverse effects to historic properties. This agreement document would be appended to the Record of Decision on the Final Environmental Impact Statement. However, since the DEIS identifies historic resource impacts and losses that may not have been specifically addressed in the Design Concept, EPA questions why the MD State Historic Preservation Officer was not included in the Distribution List for the DEIS. It is recommended that consultation with the MD SHPO be conducted throughout the planning process.



Thank you for providing EPA with the opportunity to review this project. If you have questions regarding these comments, the staff contact for this project is Karen DelGrosso; she can be reached at 215-814-2765.

Sincerely,

A handwritten signature in dark ink, appearing to read "William Arguto", with a long horizontal stroke extending to the right.

William Arguto
NEPA Team Leader
Office of Environmental Programs

Enclosure (1)

